

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	: CR NO.: 21-1530-M
vs.	:
ANDREW WOLF	:

ORDER

AND NOW, to wit, this day of , 2022, upon motion of Arthur Thomas Donato, Jr., Esquire and without objection by Kelly Harrell, Esquire, attorney for the Government, it is hereby ORDERED and DECREED that the Motion for Continuance in the above captioned matter is GRANTED. Trial is rescheduled from April 11, 2022 to the ____ day of _____, 2022.

BY THE COURT:

J.

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	: CR NO.: 21-1530-M
vs.	:
ANDREW WOLF	:

MOTION FOR CONTINUANCE

The Defendant, Andrew Wolf, by and through his counsel, Arthur Thomas Donato, Jr., Esquire and Heather J. Mattes, Esquire, hereby move for a continuance of the trial date in this matter for the following reasons:

1. Andrew Wolf is the Defendant in the above referenced matter currently incarcerated at the Federal Detention Center in Philadelphia, Pennsylvania.
2. On or about February 3, 2022 Mr. Wolf was indicted and charged with various offenses in connection with conspiracy to manufacture child pornography (18 U.S.C. §2251(a)(e); manufacture and attempted manufacture of child pornography (18 U.S.C. §2251(a)(e); aiding and abetting and willfully causing (18 U.S.C. §2) notice of forfeiture.
3. On or about February 9, 2022, Defendant was notified that trial in this matter has been scheduled for April 11, 2022.
4. The discovery in this matter is voluminous and, despite diligent efforts by counsel, counsel cannot be prepared for trial on or before April 11, 2022. Counsel believes that a continuance of ninety (90) days would provide the reasonable time necessary for effective preparation.

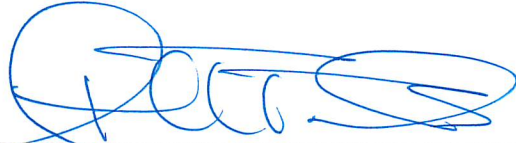
5. Additionally, counsel for the government, Kelly Harrell, Esquire, and the undersigned counsel are actively engaged in negotiations to attempt to resolve the matter by a non-trial disposition.

6. For these reasons, counsel respectfully requests the Court continue the trial date for approximately ninety (90) days.

7. Counsel for co-defendant agrees with this request.

8. The undersigned has confirmed by email March 8, 2022 that Assistant United States Attorney Kelly Harrell has no objection to this request.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'ARTHUR THOMAS DONATO, JR.', written over a horizontal line.

ARTHUR THOMAS DONATO, JR., ESQUIRE
216 W. Front Street, 2nd Floor
Media, Pennsylvania 19063
610-565-4747
Attorney for Defendant

DATE: 3-9-2022

CERTIFICATE OF SERVICE


I, Arthur Thomas Donato, Jr., Esquire, hereby certify that a copy of the Defendant's Motion for Continuance was forwarded to the individuals whose names and addresses are listed below:

The Honorable Mark A. Kearney
United States District Court
Eastern District of Pennsylvania
United States Courthouse
601 Market Street
Philadelphia, Pennsylvania 19106

Kelly Harrell, Esquire
United States Attorney's Office
Department of Justice
615 Chestnut Street, Suite 1250
Philadelphia, Pennsylvania 19106-4476

Barnaby Wittels, Esquire
1420 Walnut Street, Suite 1200
Philadelphia, Pennsylvania 19102

Heather J. Mattes, Esquire
105 South High Street, 3rd Floor
West Chester, Pennsylvania 19382



ARTHUR THOMAS DONATO, JR., ESQUIRE

DATED: 3-9-2022